

FOLEY & FOLEY  
535 High Mountain Road  
Suite 210  
North Haledon, New Jersey 07508  
Phone (973) 304-6003  
Counsel for Plaintiff

**FILED**

**MAR 22 2011**

THOMAS F. BROGAN, P.J.Cv

AMERICAN ASSET FINANCE, LLC,

*Plaintiff,*

v.

THE COREA FIRM, PLLC, AND THOMAS  
M. COREA, ESQ.,

*Defendants.*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: PASSAIC COUNTY

DOCKET NO. PAS-L- 1309 -11

CIVIL ACTION

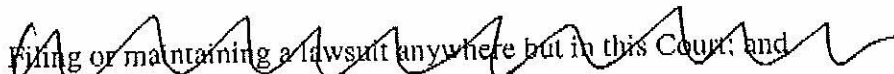
**ORDER TO SHOW CAUSE WITH**  
**TEMPORARY RESTRAINTS**  
**PURSUANT TO RULE 4:52**

THIS MATTER being brought before the Court by Sherry L. Foley, attorney for plaintiff, American Asset Finance, LLC, seeking relief by way of temporary restraints pursuant to Rule 4:52, based on the facts set forth in the verified complaint filed herewith; and it appearing that immediate and irreparable damage will probably result before notice can be given and a hearing held and for good cause shown,

It is on this 22 day of March, 2011, ORDERED that defendants The Corea Firm, PLLC, and Thomas M. Corea, Esq., appear and show cause before the Superior Court of New Jersey, Law Division, at the Passaic County Courthouse in Paterson, New Jersey, at 2 o'clock in the afternoon or as soon thereafter as counsel can be heard on the 7<sup>th</sup> day of April, 2011, why an order should not be issued preliminarily enjoining and restraining defendants, The Corea Firm, PLLC, and Thomas M. Corea, Esq., as follows:

- A. Compelling defendants to turn over to American Asset Finance, LLC, its property in the amount of \$56,000.00 plus an amount to be determined for attorney's fees and costs for this action;
- B. From interfering with American Asset Finance, LLC's right to receive payment directly from Cobb Martinez Woodward, PLLC, in relation to the matter of Wright v. HealthSouth Corporation;
- C. From attempting to reassign the property previously assigned to American Asset Finance, LLC;
- D. From filing or maintaining a lawsuit anywhere but in this Court;
- E. Compelling defendants to deposit with this Court \$90,000.00, representing the entire attorney's fees and disbursements portion of the settlement proceeds from the matter of Wright v. HealthSouth Corporation; and
- F. Granting such other relief as the Court deems equitable and just.

And it is further ORDERED that pending the return date herein, defendant is temporarily enjoined and restrained from:

- A. Interfering with American Asset Finance, LLC's right to receive payment directly from Cobb Martinez Woodward, PLLC, in relation to the matter of Wright v. HealthSouth Corporation;
- B. Attempting to reassign the property previously assigned to American Asset Finance, LLC;
- C. Withdrawing any funds from the attorney trust account of defendants;
- D.  Filing or maintaining a lawsuit anywhere but in this Court; and

E. Granting such other relief as the Court deems equitable and just.

And it is further ORDERED that:

1. The defendants may move to dissolve or to modify the temporary restraints herein contained on two (2) days notice to the plaintiff's attorney.

2. A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served on defendants via e-mail and overnight delivery within three (3) days of the date hereof, in accordance with Rule 4:4-3 and Rule 4:4-4, this being original process.

3. The plaintiff must file with the court his/her/its proof of service of the pleadings on the defendant no less than three (3) days before the return date.

4. Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by April 1, 2011. The original documents must be filed with the Clerk of the Superior Court of New Jersey in Passaic County. A list of these offices is provided. You must send a copy of your opposition papers directly to Judge Thomas Bregda, whose address is Passaic County Courthouse, 77 Hamilton Street, Paterson, New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above. A telephone call will not protect your rights. You must file your opposition, pay the required fee of \$<sup>135.00</sup>~~200.00~~, and serve your opposition on your adversary if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.

5. The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by April 5, 2011. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge Thomas Brugel.

~~6. If the defendants do not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.~~

7. If the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.


8. **Defendants take notice:** The plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a <sup>135.00</sup>~~\$200.00~~ filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do

not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

9. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

10. The Court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than 2 days before the return date.

  
\_\_\_\_\_  
Thomas F. H. [illegible] J.S.C.

**LAWYER REFERRAL SERVICES**

<i>Atlantic County</i>	<i>Lawyer Referral Service (609) 345-3444</i>
<i>Bergen County</i>	<i>Lawyer Referral Service (201) 488-0044</i>
<i>Burlington County</i>	<i>Lawyer Referral Service (609) 261-4862</i>
<i>Camden County</i>	<i>Lawyer Referral Service (609) 964-4520</i>
<i>Cape May County</i>	<i>Cape May County Bar Association (609) 463-0313</i>
<i>Cumberland County</i>	<i>Lawyer Referral Service (609) 692-6207</i>
<i>Essex County</i>	<i>Lawyer Referral Service (201) 622-6207</i>
<i>Gloucester County</i>	<i>Lawyer Referral Service (609) 848-4589</i>
<i>Hudson County</i>	<i>Lawyer Referral Service (201) 798-2727</i>
<i>Hunterdon County</i>	<i>Hunterdon County Bar Association (908) 735-2611</i>
<i>Mercer County</i>	<i>Mercer County Bar Association (609) 890-6200</i>
<i>Middlesex County</i>	<i>Middlesex County Bar Association (908) 828-0053</i>
<i>Monmouth County</i>	<i>Monmouth County Bar Association (908) 431-5544</i>
<i>Morris County</i>	<i>Morris County Bar Association (201) 267-5882</i>
<i>Ocean County</i>	<i>Ocean County Bar Association (908) 240-3666</i>
<i>Passaic County</i>	<i>Lawyer Referral Service (201) 278-9223</i>
<i>Salem County</i>	<i>Lawyer Referral Service (609) 678-8363</i>
<i>Somerset County</i>	<i>Lawyer Referral Service (908) 685-2323</i>
<i>Sussex County</i>	<i>Sussex County Bar Association (201) 267-5882</i>
<i>Union County</i>	<i>Lawyer Referral Service (908) 353-4715</i>
<i>Warren County</i>	<i>Warren County Bar Association (908) 689-7722</i>

**LEGAL SERVICES OFFICES**

<i>Atlantic County</i>	<i>(609) 348-4200</i>
<i>Bergen County</i>	<i>(201) 487-2166</i>
<i>Burlington County</i>	<i>(609) 964-8251 (See Camden County)</i>
<i>Camden County</i>	<i>(609) 964-8251 (including Gloucester, Salem, Cumberland and Burlington Counties)</i>
<i>Cape May County</i>	<i>(609) 465-3001</i>
<i>Cumberland County</i>	<i>(609) 825-6090</i>
<i>Essex County</i>	<i>(201) 624-4500</i>
<i>Gloucester County</i>	<i>(609) 964-8251 (See Camden County)</i>
<i>Hudson County</i>	<i>(201) 792-6363</i>
<i>Hunterdon County</i>	<i>(908) 782-7979</i>
<i>Mercer County</i>	<i>(609) 695-6249</i>
<i>Middlesex County</i>	<i>(908) 249-7600</i>
<i>Monmouth County</i>	<i>(908) 747-7400</i>
<i>Morris County</i>	<i>(201) 285-6911 (Eastern); (201) 361-9386 (Western)</i>
<i>Ocean County</i>	<i>(908) 341-2727</i>
<i>Passaic County</i>	<i>(201) 345-7171</i>
<i>Salem County</i>	<i>(609) 964-8251 (See Camden County)</i>
<i>Somerset County</i>	<i>(908) 231-0840</i>
<i>Sussex County</i>	<i>(201) 383-7400</i>
<i>Union County</i>	<i>(908) 354-4340</i>
<i>Warren County</i>	<i>(908) 475-2010</i>